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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	INDICTMENT
Plaintiff,	)	
	)	
v.	)	CASE NO. 1 16 CR 0275
	)	Title 21, Sections 841(a)(1) and (b)(1)(C),
DAVID ANDREW HOLLIS, JR.,	)	United States Code
aka DAE DAE,	)	Title 21, Section 843(b), United States Code
	)	
Defendant.	)	

JUDGE GAUGHAN

COUNT 1

The Grand Jury charges:

On or about October 29, 2015, in the Northern District of Ohio, Eastern Division, DAVID ANDREW HOLLIS, JR., aka DAE DAE, the defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 2

The Grand Jury further charges:

On or about October 29, 2015, in the Northern District of Ohio, Eastern Division, DAVID ANDREW HOLLIS, JR., aka DAE DAE, the defendant herein, did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 843(b).

COUNT 3

The Grand Jury further charges:

On or about December 17, 2015, in the Northern District of Ohio, Eastern Division, DAVID ANDREW HOLLIS, JR., aka DAE DAE, the defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 4

The Grand Jury further charges:

On or about December 17, 2015, in the Northern District of Ohio, Eastern Division, DAVID ANDREW HOLLIS, JR., aka DAE DAE, the defendant herein, did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 843(b).

COUNT 5

The Grand Jury further charges:

On or about February 21, 2016, in the Northern District of Ohio, Eastern Division, DAVID ANDREW HOLLIS, JR., aka DAE DAE, the defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

ENHANCED PENALTY UNDER TITLE 21, UNITED STATES CODE, SECTION 841(b)(1)(C)

(Death or Serious Bodily Injury Resulting from Use of Controlled Substance)

The allegations of Count 5 are hereby re-alleged and incorporated herein. On or about February 21, 2016, in the Northern District of Ohio, IND-1, a person whose identity is known to the Grand Jury, did fatally ingest and overdose on a controlled substance, namely fentanyl, which DAVID ANDREW HOLLIS, JR., aka DAE DAE, had distributed to IND-1.

As a result of DAVID ANDREW HOLLIS, JR.'s, distribution of fentanyl as alleged in Count 5, death did result from the use of fentanyl, a Schedule II controlled substance, in violation of the enhanced penalty provisions of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 6

The Grand Jury further charges:

On or about February 21, 2016, in the Northern District of Ohio, Eastern Division, DAVID ANDREW HOLLIS, JR., aka DAE DAE, the defendant herein, did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 843(b).

COUNT 7

The Grand Jury further charges:

On or about February 23, 2016, in the Northern District of Ohio, Eastern Division, DAVID ANDREW HOLLIS, JR., aka DAE DAE, the defendant herein, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 8

The Grand Jury further charges:

On or about February 23, 2016, in the Northern District of Ohio, Eastern Division, DAVID ANDREW HOLLIS, JR., aka DAE DAE, the defendant herein, did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 843(b).

COUNT 9

The Grand Jury further charges:

On or about March 1, 2016, in the Northern District of Ohio, Eastern Division, DAVID ANDREW HOLLIS, JR., aka DAE DAE, the defendant herein, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, the allegations of Counts 1-9 are incorporated herein by reference. As a result of the foregoing offenses, defendant DAVID ANDREW HOLLIS, JR., aka DAE DAE, shall forfeit to the United States any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of such violations; and any and all of his property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations.

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts pursuant to the E-Government Act of 2002.